

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

SFA Name: Divine Mercy School

Administrative Review Conducted on: 1/10/2017

Sites Selected for Review: Divine Mercy School 407336

Commendations & Suggestions

Outstanding job meeting all of the requirements for the new meal pattern. All daily and weekly meal component and food quantity requirements were met.

Menus reflect good variety, especially in fresh fruits offered during the week.

The SFA was eager to learn from all guidance and suggestions provided by the reviewer.

The kitchen staff was kind and courteous and interacted well with the students.

Other areas of Technical Assistance (NOT requiring Corrective Action)

706. The SFA should annually complete the Paid Lunch Equity Tool. Although the SFA's paid lunch price is currently above equity, the PLE Tool will ensure the SFA has documentation showing compliance with paid lunch equity requirements. The tool can be found on the USDA website or the DPI website, and a blank copy of the SY 16-17 tool was sent to the SFA during the review.

107. During the review, household notification of eligibility status was discussed with the SFA. For all households that qualify for benefits must be notified within 10 days of receipt of the completed application, however it is not required that these households are notified in writing. The SFA must notify the household of denied benefits in writing, the notification must be provided within 10 days of receipt of a completed application. The SFA should make sure that the correct contact information for the hearing official is listed on their letter. For additional information on the notification letter the SFA should review the Eligibility Manual for School Meals, Chapter 3.

112. During the review, the benefit issuance document (BID) was discussed with the SFA. The BID should contain at a minimum the students name, benefit status, how eligibility was determined, whether it be a meal benefit application, DC, SNAP, TANF, categorically eligible, etc., the date the benefit was established, and the date the benefit expires.

212. During the on-site review, documenting follow-up attempts was discussed with the SFA. The SFA must make and document at least one follow-up attempt.

1405. During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publically visible location at the site.

Date Corrective Action Plan was provided to SFA: 2/3/2017

Due Date for Corrective Action Plan:

3/3/2017

The following pages address the findings that were identified during your Administrative Review.

For each finding you will be presented with the following:

The finding, and details specific to the SFA regarding the finding

A summary of the regulation / requirement

The Code of Federal Regulations citation number or alternate resource citation

Suggested guidance for the SFA in order to achieve compliance

SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the spaces provided.

Finding #1
The SFA incorrectly reported financial information on the annual CNP Report.
Technical Assistance Provided
On the SFA's Child Nutrition Program Report submitted to DPI for SY 15-16, the SFA accidentally reported their revenues in the "Labor Expenditures" line rather than the "All Other Fund 50 Revenue" line. The financial report should be revised to show the revenues in the correct line.
Regulation / Citation and Summary
7 CFR 210.14 (c) Financial assurances. The school food authority shall meet the requirements of the State agency for compliance with § 210.19(a) including any separation of records of nonprofit school food service from records of any other food service which may be operated by the school food authority as provided in paragraph (a) of this section.
SFA Suggested Guidance for Compliance
As the corrective action response, please explain the reporting errors made and the steps that were taken to amend the CNP Report. Additionally, please explain how the SFA will more carefully monitor the reporting process to ensure accuracy on future financial reports.
SFA Response

Finding #2
202. The confirming official may not also be the determining and verifying official.

Technical Assistance Provided
During the review the SFA was informed that the confirming official may not also be the determining and the verifying official. The SFA should review the current Income Eligibility Manual for additional verification requirements. The SFA was also reminded that the hearing official may not be the determining, confirming, nor the verifying official.
Regulation / Citation and Summary
CFR 245.6a(e)(1)(i) Confirmation of a household's initial eligibility. Prior to conducting any other verification activity, an individual, other than the individual who made the initial eligibility determination, shall review for accuracy each approved application selected for verification to ensure that the initial determination was correct. If the initial determination was correct, the local educational agency shall verify the approved application.
SFA Suggested Guidance for Compliance
To bring this area into compliance the SFA must provide the State Agency an assurance that the staff understands this requirement. The SFA must submit the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.
SFA Response

Finding #3
203. The SFA's verification process is not being conducted according to USDA guidelines. The SFA did not base the sample pool on the count as of October 1.
Technical Assistance Provided
During the review, basing the sample pool on the count as of October 1 was discussed with the SFA. The SFA must base the sample pool on the count as of October 1.
Regulation / Citation and Summary
245.6a(b)(3) Beginning verification activities. The local educational agency may conduct verification activity once it begins the application approval process for the current school year and has approved applications on file. However, the final required sample size must be based on the number of approved applications on file as of October 1.
SFA Suggested Guidance for Compliance
To come into compliance with basing the sample pool on the count as of October 1, the SFA must provide the State Agency with an assurance that staff conducting verification understand this requirement, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency.
SFA Response

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Finding #4
306. The SFA does not conduct a daily edit check for each meal service.
Technical Assistance Provided
During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation and Summary
210.8(a)(3) Edit checks. (i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA is now conducting a daily edit check for each meal service, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at http://www.schoolnutritiontoolbox.org/snt-v3/index.php and submit one week of completed edit checks.
SFA Response

Finding #5
801. The SFA did not submit a public release.

Technical Assistance Provided
<p>During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.</p>
Regulation / Citation and Summary
<p>§245.5(a)(1) After the State agency, or FNSRO where applicable, notifies the local educational agency (as defined in §245.2) that its criteria for determining the eligibility of children for free and reduced price meals and for free milk have been approved, the local educational agency (as defined in §245.2) shall publicly announce such criteria: Provided however, that no such public announcement shall be required for boarding schools, residential child care institutions (see §210.2 of this chapter, definition of Schools), or a school which includes food service fees in its tuition, where all attending children are provided the same meals or milk. Such announcements shall be made at the beginning of each school year or, if notice of approval is given thereafter, within 10 days after the notice is received. The public announcement of such criteria, as a minimum, shall include the following: (1) Except as provided in §245.6(b), a letter or notice and application distributed on or about the beginning of each school year, to the parents of all children in attendance at school. The letter or notice shall contain the following information: (i) In schools participating in a meal service program, the eligibility criteria for reduced price benefits with an explanation that households with incomes less than or equal to the reduced price criteria would be eligible for either free or reduced price meals, or in schools participating in the free milk option, the eligibility criteria for free milk benefits; (ii) How a household may make application for free or reduced price meals or for free milk for its children; (iii) An explanation that an application for free or reduced price benefits cannot be approved unless it contains complete information as described in paragraph (1)(i) of the definition of Documentation in §245.2; (iv) An explanation that households with children who are members of currently certified SNAP, FDPIR or TANF households may submit applications for these children with the abbreviated information described in paragraph (2)(ii) of the definition of Documentation in §245.2; (v) An explanation that the information on the application may be verified at any time during the school year; (vi) How a household may apply for benefits at any time during the school year as circumstances change; (vii) A statement to the effect that children having parents or guardians who become unemployed are eligible for free or reduced price meals or for free milk during the period of unemployment, Provided, that the loss of income causes the household income during the period of unemployment to be within the eligibility criteria;</p>
<p>(viii) The statement: "In the operation of child feeding programs, no child will be discriminated against because of race, sex, color, national origin, age or disability."; (ix) An explanation that Head Start enrollees and foster, homeless, migrant, and runaway children, as defined in §245.2, are categorically eligible for free meals and free milk and their families should contact the school for more information; (x) How a household may appeal the decision of the local educational agency with respect to the application under the hearing procedure set forth in §245.7. The letter or notice shall be accompanied by a copy of the application form required under §245.6; (xi) A statement to the effect that the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) participants may be eligible for free or reduced price meals.</p>

SFA Suggested Guidance for Compliance
To come into compliance with civil rights requirements, the SFA must indicate that the public release will be sent to the local media at the beginning of the school year. Additionally, the SFA must identify the name(s) and title(s) of the person(s) who will be responsible for submitting the public release for publishing. Please submit the assurance and plan to the State Agency.
SFA Response

Finding #6
1005. An assessment of the Local School Wellness Policy has not been completed.
Technical Assistance Provided
During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy. The SFA was shown the Local Wellness Policy Report Card Online Tool on the DPI website.
Regulation / Citation and Summary
<p>210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local educational agency must: (1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy; (2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include: (i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy; (ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and (iii) A description of the progress made in attaining the goals of the local school wellness policy.</p> <p>(3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.</p>
SFA Suggested Guidance for Compliance
To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted to the state agency for review.

SFA Response

Finding #7
<p>126. Not all selected applications were approved correctly. Not all income based applications included the last four digits of the social security, number of an adult household member, or an indication of none. Not all selected applications were approved correctly. The SFA did not calculate the income and household size correctly.</p>
Technical Assistance Provided
<p>During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has included the last four digits of the social security number of an adult household member (or an indication of none); otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3.</p> <p>Determining applications was also discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.</p>
Regulation / Citation and Summary
<p>245.6(a)(6) Household members and social security numbers. The application must require applicants to provide the names of all household members. In addition, the last four digits of the social security number of the adult household member who signs the application must be provided. If the adult member signing the application does not possess a social security number, the household must so indicate.</p> <p>245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. When a household submits an application containing complete documentation, as defined in §245.2, and the household's total current income is at or below the eligibility limits specified in the Income Eligibility Guidelines as defined in §245.2, the children in that household must be approved for free or reduced price benefits, as applicable.</p>
SFA Suggested Guidance for Compliance

To come into compliance with the requirements for determining applications, the SFA must provide the State Agency with an assurance that staff administering the free and reduced lunch program understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Applications found to be incorrectly determined during the review must be corrected, and the corrected application and date of the correction must be submitted to the State Agency. If the SFA is unable to correct the error because of missing/incomplete information from the household, after allowing the household an adequate amount of time to respond, the SFA must send a letter of adverse action and advise the State Agency of the date that this letter was sent.

SFA Response

Finding #8
128. The SFA annualized income when it should have been determined at its stated frequency.
Technical Assistance Provided
During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.
Regulation / Citation and Summary
245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. Eligibility Manual, Chapter 3: If there is only one source of income, or if all sources are received in the same frequency, the LEA totals all sources and compares the total to the IEGs.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for determining applications, the SFA must provide written assurance that the SFA will determine applications based on the frequency of pay provided on the application when only one frequency is listed and that the SFA will use the correct conversions factors when multiple pay frequencies are provided to determine the annual income.
SFA Response

Finding #9
134. The SFA did not perform Direct Certification matches according to the required timeframes.
Technical Assistance Provided
During the review, Direct Certification matches were discussed with the SFA. The SFA must perform at least 3 Direct Certification matches according to the timeframes established by the State Agency. The SFA may elect to complete additional direct certification matches however at a minimum they must complete 3 match within the set timeframe.
Regulation / Citation and Summary
245.6(b)(3) Frequency of direct certification contacts with SNAP. (ii) (A) Beginning in School Year 2011-2012, at a minimum, all local educational agencies must conduct direct certification as follows: (1) At or around the beginning of the school year; (2) Three months after the initial effort; and (3) Six months after the initial effort.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for Direct Certification matching, the SFA must provide the State Agency with an assurance that staff administering the free and reduced lunch program understand these requirements, and that the SFA will complete the Direct Certification matches at least 3 times a year at the state prescribed timeframes.
SFA Response

Finding #10
207. The FNS-742 for the 2016-2017 school year was not completed so the FNS-742 for 2015-2016 SY was reviewed. The SFA did not verify the correct number of applications for the 2015-2016 school year SY. The SFA verified all applications that were submitted.
Technical Assistance Provided
During the review, the number of applications to be reviewed was discussed with the SFA. The SFA must verify exactly the number of applications as described in the Eligibility Manual for School Meals, Chapter 4.
Regulation / Citation and Summary
245.6a(c)(3) Standard sample size. Unless eligible for an alternative sample size under paragraph

(d) of this section, the sample size for each local educational agency shall equal the lesser of: (i) Three (3) percent of all applications approved by the local educational agency for the school year, as of October 1 of the school year, selected from error prone applications; or (ii) 3,000 error prone applications approved by the local educational agency for the school year, as of October 1 of the school year. (iii) Local educational agencies shall not exceed the standard sample size in paragraphs (c)(3)(i) or (c)(3)(ii) of this section, as applicable, and, unless eligible for one of the alternative sample sizes provided in paragraph (c)(4) of this section, the local educational agency shall not use a smaller sample size than those in paragraphs (c)(3)(i) or (c)(3)(ii) of this section, as applicable. (iv) If the number of error-prone applications exceeds the required sample size, the local educational agency shall select the required sample at random, i.e., each application has an equal chance of being selected, from the total number of error-prone applications.

SFA Suggested Guidance for Compliance

To come into compliance with the verification sample size requirement, the SFA must provide the State Agency with an assurance that staff conducting verification understand how to calculate the correct number of applications that should be verified, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency.

SFA Response

Finding #11

209. Not all applications selected for review were verified correctly. The SFA did not determine the correct eligibility based on household income and size.

Technical Assistance Provided

During the review, collateral contacts were discussed with the SFA. The SFA must comply with the requirements for collateral contacts as outlined in the Eligibility Manual for School Meals, Chapter 4.

Regulation / Citation and Summary

245.6a(a)(7)(ii) Collateral contacts are verbal confirmations of a household's circumstances by a person outside of the household. If the verifying official designates a collateral contact, the contact shall not be made without providing written or oral notice to the household. At the time of this notice, the household shall be informed that it may consent to the contact or provide acceptable documentation in another form. If the household refuses to choose one of these options, its eligibility shall be terminated in accordance with the normal procedures for failure to cooperate with verification efforts.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for documenting collateral contacts, the SFA must provide the State Agency with an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency.

SFA Response

Finding #12
211. The SFA's verification notification letter does not include all of the required information.
Technical Assistance Provided
During the review, the content of the verification notification letter was discussed with the SFA. In its notification letter, the SFA must include the information outlined in the Eligibility Manual for School Meals, Chapter 4.
Regulation / Citation and Summary
245.6a(f) Verification procedures and assistance for households—(1) Notification of selection. Other than households verified through the direct verification process in paragraph (g) of this section, households selected for verification must be notified in writing that their applications were selected for verification. The written statement must include a telephone number for assistance as required in paragraph (f)(5) of this section. Any communications with households concerning verification must be in an understandable and uniform format and, to the maximum extent practicable, in a language that parents and guardians can understand. These households must be advised of the type of information or documents the school accepts. Households selected for verification must be informed that: (i) They are required to submit the requested information to verify eligibility for free or reduced-price meals, by the date determined by the local educational agency. (ii) They may, instead, submit proof that the children receive SNAP, FDPIR, or TANF assistance, as explained in paragraph (f)(3) of this section. (iii) They may, instead, request that the local educational agency contact the appropriate officials to confirm that their children are foster, homeless, migrant, or runaway, as defined in §245.2. (iv) Failure to cooperate with verification efforts will result in the termination of benefits.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for the verification notification letter, the SFA must provide the State Agency with an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, as well as the revised verification notification letter.
SFA Response

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Finding #13
213. The SFA's notice of adverse action did not contain all required information.
Technical Assistance Provided
During the review, the notice of adverse action was discussed with the SFA. In its notice, the SFA must include the information as outlined in the Eligibility Manual for School Meals, Chapter 4.
Regulation / Citation and Summary
245.6a(j) Adverse action. If verification activities fail to confirm eligibility for free or reduced price benefits or should the household fail to cooperate with verification efforts, the school or local educational agency shall reduce or terminate benefits, as applicable, as follows: Ten days advance notification shall be provided to households that are to receive a reduction or termination of benefits, prior to the actual reduction or termination. The first day of the 10 day advance notice period shall be the day the notice is sent. The notice shall advise the household of: (1) The change; (2) The reasons for the change; (3) Notification of the right to appeal and when the appeal must be filed to ensure continued benefits while awaiting a hearing and decision; (4) Instructions on how to appeal; and (5) The right to reapply at any time during the school year. The reasons for ineligibility shall be properly documented and retained on file at the local educational agency.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for notices of adverse action, the SFA must provide the State Agency with an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, as well as a revised copy of the notice of adverse action.
SFA Response

Finding #14
1216. No one person has been designated as the food service director. Someone must complete the training hours required for a food service director.
Technical Assistance Provided

During the review, the SFA was informed that a director must be assigned and complete the required training hours as director.

Please visit the site: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf> for professional standards information.

The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.

Please keep in mind that WI requires someone in the SFA to hold a certificate of Food Protective Practices when the SFA participates in NSLP. This is administered by DHS.

Regulation / Citation and Summary

210.30(b) Minimum standards for all school nutrition program directors. Each school food authority must ensure that all newly hired school nutrition program directors meet minimum hiring standards, as set forth in this section.

SFA Suggested Guidance for Compliance

To come into compliance, one person must be assigned as food service director. Please ensure that the hiring standards and training requirements are met. Please submit a copy of all hours of training completed and the dates of all future trainings.

SFA Response

Finding #15

1219. The SFA is not tracking training hours.

Technical Assistance Provided

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Regulation / Citation and Summary

210.30(g) School food authority oversight. Each school year, the school food authority director must

document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that training is now being tracked. A completed tracker must be submitted to the State Agency that includes all employees.

SFA Response

Finding #16

318. The point of service did not provide an accurate meal count by eligibility status. This is a systemic error. The SFA had a total meal count for the day, but did not have a roster sheet available to check off which student received a meal to determine the free/reduced/paid breakdown. A recalculation is required.

Technical Assistance Provided

During the review, an accurate point of service was discussed with the SFA. The point of service does not provide an accurate meal count by eligibility status. This is a systemic error. To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately. The SFA was informed via email that a recalculation is required. The SFA was informed that 30 days worth of meal counts must be submitted as part of the corrective action response. CNR will notify the SFA when the 30 days will begin. This will only begin after an accurate point of sale process has been provided from the SFA to CNR.

Regulation / Citation and Summary

210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum: (iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA will advise the State Agency that the systemic error has been corrected, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at <http://www.schoolnutritiontoolbox.org/snt-v3/index.php>. 30 operating days worth of meal counts must be submitted to complete the recalculation. These meal counts may be submitted after the responses for this corrective action plan are due.

SFA Response

Finding #17

320. Meal count totals by category have not been combined or recorded correctly. This is a systemic error. To create the claim for reimbursement, the SFA was using a combination of methods. The SFA had a roster check off sheet that was used as the POS, and a student's name was checked when they passed with a reimbursable meal. However, they would also use the number of meals served that the kitchen determined on the daily production record based on the amount of food served and a tray count.

Technical Assistance Provided

During the review, claiming was discussed with the SFA. Meal count totals by category have not been combined or recorded correctly. This is a non-systemic error. To be in compliance, the SFA must ensure that meal counts are being recorded accurately. Consolidating meal counts by category was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

Regulation / Citation and Summary

210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum: (iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA is now combining or recording meal count totals by category correctly, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at <http://www.schoolnutritiontoolbox.org/snt-v3/index.php>.

SFA Response

Finding #18
325. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement.
Technical Assistance Provided
During the review, counting and claiming were discussed with the SFA. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. To be in compliance, the SFA must ensure that meal counts are being recorded accurately and that claims are being filed correctly. Proper counting and claiming procedures were reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation and Summary
210.7(c) Reimbursement limitations. To be entitled to reimbursement under this part, each school food authority shall ensure that Claims for Reimbursement are limited to the number of free, reduced price and paid lunches and meal supplements that are served to children eligible for free, reduced price and paid lunches and meal supplements, respectively, for each day of operation.
SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA has corrected inaccurate counting and/or claiming procedures, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at <http://www.schoolnutritiontoolbox.org/snt-v3/index.php>.

SFA Response

Finding #19
1407. Temperature logs are not being maintained for all food storage areas.
Technical Assistance Provided
During the on-site review, temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of 6 months.
Regulation / Citation and Summary
210.15(b)(5) The SFA must maintain records from the food safety program for a period of six months following a month's temperature records to demonstrate compliance with §210.13(c), and records from the most recent food safety inspection to demonstrate compliance with §210.13(b).
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for food safety, the SFA must provide the State Agency with an assurance that the appropriate staff understand the requirements for food safety documentation. The assurance should include; a statement that the food safety plan will be implemented at each site, a statement that proper documentation practices will be established at each site, a statement that all temperature documents will be maintained for a minimum of 6 months, and that training will be completed for all appropriate SFA staff. Provide the agenda and sign-in sheets from the trainings.
SFA Response

